

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

**PLAINTIFF FRACTUS, S.A.**

**V**

**DEFENDANTS SAMSUNG ELECTRONICS CO., et al.**

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**CASE NO.: 6:09-CV-203**

**DEFENDANTS' HTC CORPORATION AND HTC AMERICA, INC.'S OBJECTIONS  
TO PLAINTIFF FRACTUS, S.A.'S INFRINGEMENT EXHIBIT LIST**

<b>Presiding Judge:</b>  <b>HONORABLE LEONARD E. DAVIS</b>	<b>Plaintiff's Attorney(s):</b> <b>Max L. Tribble</b> <b>Justin Nelson</b> <b>Victoria L. Cook</b> <b>Genevieve Vose</b> <b>Dan Shih</b> <b>Matthew Behnke</b> <b>Michael Heim</b> <b>Leslie V. Payne</b> <b>Micah J. Howe</b> <b>T. John Ward, Jr.</b> <b>S. Calvin Capshaw</b>	<b>Defendant's Attorneys:</b> <b>David G. Wille</b> <b>Rod Phelan</b> <b>Samir A. Bhavsar</b> <b>Jeff Baxter</b> <b>Jonathan Rubenstein</b> <b>Mike Jones</b> <b>Allen Gardner</b>
<b>Trial / Hearing Date(s):</b> 05/31/11	<b>Court Reporter:</b> <b>Shea Sloan</b>	<b>Courtroom Deputy:</b> Rosa Ferguson

<b>PLTF EXH. NO.</b>	<b>DESCRIPTION</b>	<b>OBJECTIONS</b>
<b>1</b>	<b>03/21/2006 U.S. Patent Number 7,015,868 B2</b>	
<b>2</b>	<b>10/17/2006 U.S. Patent Number 7,123,208 B2</b>	
<b>3</b>	<b>07/01/2008 U.S. Patent Number 7,394,432 B2</b>	
<b>4</b>	<b>07/08/2008 U.S. Patent Number 7,397,431 B2</b>	
<b>5</b>	<b>05/05/2009 U.S. Patent Number 7,528,782 B2</b>	
<b>6</b>	<b>08/12/2008 U.S. Patent Number 7,411,556 B2</b>	
<b>7</b>	<b>12/25/2007 U.S. Patent Number 7,312,762 B2</b>	
<b>8</b>	<b>03/18/2002 File History for U.S. Patent Application Number 10/102,568</b>	
<b>9</b>	<b>03/21/2006 File History for U.S. Patent Number 7,015,868</b>	
<b>10</b>	<b>10/17/2006 File History for U.S. Patent Number 7,123,208</b>	
<b>11</b>	<b>07/01/2008 File History for U.S. Patent Number 7,394,432</b>	
<b>12</b>	<b>07/08/2008 File History for U.S. Patent Number 7,397,431</b>	
<b>13</b>	<b>05/05/2009 File History for U.S. Patent Number 7,528,782</b>	
<b>14</b>	<b>08/12/2008 File History for U.S. Patent Number 7,411,556</b>	
<b>15</b>	<b>12/25/2007 File History for U.S. Patent Number 7,312,762</b>	
<b>16</b>	<b>05/04/2001 File History of PCT/ES9900296 for U.S. Patent Number 7,015,868</b>	
<b>17</b>	<b>04/24/2003 File History of PCT/EP0111914 for U.S. Patent Number 7,312,762</b>	
<b>18</b>	<b>07/02/2003 File History of PCT/EP0214706 for U.S. Patent Number 7,411,556</b>	

<b>PLTF EXH. NO.</b>	<b>DESCRIPTION</b>	<b>OBJECTIONS</b>
<b>19</b>	<b>05/19/1995 Spanish Patent Number 2,112,163</b>	
<b>20</b>	<b>00/00/0000 Various Fractus Prototypes</b>	<b>402/403, 901</b>
<b>21</b>	<b>04/19/1999 Contract between Fractus and the Polytechnic University of Catalunya</b>	
<b>22</b>	<b>03/26/1986 Regulations Regarding Patents at the Universitat Politecnica de Catalunya</b>	<b>802,901</b>
<b>23</b>	<b>05/07/1999 First Agreement, Second Agreement and Public Deed of Assignment of Rights, between Fractus and Francisco Moyano Carmona</b>	
<b>24</b>	<b>07/26/2010 License Agreement between Fractus and Ficosa</b>	
<b>25</b>	<b>07/23/2009 Settlement and License Agreement between Fractus and Apple</b>	
<b>26</b>	<b>03/18/2010 Settlement and License Agreement between Fractus and Motorola</b>	
<b>27</b>	<b>09/30/2010 Settlement and License Agreement between Fractus and Sharp</b>	
<b>28</b>	<b>08/03/2010 Settlement Agreement between Fractus and Sanyo</b>	
<b>29</b>	<b>12/07/2010 Settlement Agreement between Fractus and Palm</b>	
<b>30</b>	<b>11/12/2010 Settlement Agreement between Fractus and UTStarcomm</b>	
<b>31</b>	<b>09/27/2004 PR Newswire Article Frost &amp; Sullivan Award Recognises Fractus' Expertise in Technology Innovation</b>	<b>402/403, 802</b>
<b>32</b>	<b>12/20/1999 - 03/30/2010 Chart re Fractus Sales Data</b>	<b>402/403, 901</b>
<b>33</b>	<b>00/00/2006 Article re A Multiband Antenna for Mobile Phones by H. Tamaoka, H. Hamada and T. Ueno</b>	<b>402/403, 802</b>

<b>PLTF EXH. NO.</b>	<b>DESCRIPTION</b>	<b>OBJECTIONS</b>
<b>34</b>	<b>03/00/2006 Microwave and Optical Technology Letters Article re A Folded and Bent Internal Loop Antenna for GSM/DCS/PCS Operation of Mobile Handset Applications</b>	<b>402/403, 802</b>
<b>35</b>	<b>08/00/2006 Microwave and Optical Technology Letters Article re Internal Folded Loop antenna with Tuning Notches for GSM/GPS/DCS/PCS Mobile Handset Applications (Maron Ex. 6)</b>	<b>402/403, 802</b>
<b>36</b>	<b>12/31/2000 - 12/31/2005 Fractus Statement of Income Forecast</b>	
<b>37</b>	<b>01/09/2011 Screenshot re NPD Group Profile and NPD Group Mobile Phone Track</b>	
<b>38</b>	<b>12/31/2005 Chart re Model Summary from NPD Mobile Phone Track</b>	<b>402/403, 901, timeliness</b>
<b>39</b>	<b>08/28/2001 U.S. Patent Number 6,281,846 B1</b>	<b>402/403</b>
<b>40</b>	<b>01/10/2007 Memo from C. Puente and J. Mumbru to J. Ortigosa, X. Esteve, A. Sanz, J. Anguera, E. Kim re Patent Marking of Mobile Product</b>	<b>402/403, 802</b>
<b>41</b>	<b>00/00/0000 Various awards and prizes awarded to Fractus Antennas</b>	<b>Spanish</b>
<b>42</b>	<b>05/19/2005 Email from C. Puente to A.. Algans, A. Prieto et al re 10<sup>th</sup> Anniversary First Fractal Antenna Patent</b>	<b>402/403, 802</b>
<b>43</b>	<b>12/31/2006 - 00/00/2010 Non-US sales of “Interrogatory Phones” for Samsung</b>	<b>402/403, timeliness</b>
<b>44</b>	<b>00/00/2007 Presentation re IE3D for the Design of Planar and 3D Antennas</b>	<b>402/403, 611, 802, 901, timeliness</b>
<b>45</b>	<b>00/00/0000 Summary of Accused Sales by Patent/Claim Units</b>	<b>402/403</b>
<b>46</b>	<b>12/01/1998 Article entitled Las Antenas Fractales y el Premio Europeo a las Tecnologias de la Informacion (EITP ‘98) by C. Puente</b>	<b>402/403, 802, 901, Spanish</b>

<b>PLTF EXH. NO.</b>	<b>DESCRIPTION</b>	<b>OBJECTIONS</b>
<b>47</b>	<b>06/10/2010 U.S. Patent Application Publication 2010/014537 A1</b>	<b>402/403, timeliness</b>
<b>48</b>	<b>03/00/2005 LG Consumer Studies: Qualitative Study: New Model Cell Phone &amp; Feature Evaluation. Quantitative Study: LG Electronics Feature Study (Naugler 16)</b>	<b>402/403, 802, timeliness</b>
<b>49</b>	<b>01/05/2007 Presentation re PEC Study - VX8600 Data (Naugler 14)</b>	<b>402/403, 802, timeliness</b>
<b>50</b>	<b>00/00/0000 Accused Sales by Patent/Claim (Remaining 15 Claims) for HTC</b>	<b>402/403, 802</b>
<b>51</b>	<b>09/00/2004-12/00/2010 Spreadsheet of Sales based on FT brand or FT PCL and sales (Richardson Ex. 19)</b>	<b>402/403, 802</b>
<b>52</b>	<b>11/19/2010 Richardson Electronics product web page re FR01-B3-W-0-055 Fractus Antenna Unit (Off-the-Shelf Internal Antenna for FM Band Applications) (Richardson Ex. 21)</b>	<b>402/403, 802</b>
<b>53</b>	<b>00/00/2007 Fractus Data Sheet re Off-the-shelf internal antenna for FM band applications, FracFM Antenna FR01-B3-W-0-055 (Richardson Ex. 22)</b>	<b>402/403, 802</b>
<b>54</b>	<b>02/20/2009 Richardson Electronics, Ltd. Application Note for Fractus Antenna Storage (Richardson Ex. 23)</b>	<b>402/403, 802</b>
<b>55</b>	<b>02/0/1999 - 04/11/1999 Figures from Multi-Level specification</b>	<b>402/403, 802, 901</b>
<b>56</b>	<b>03/06/2003 Email from A. Sanz to H. Moon-hwan re Antenna Test cases</b>	<b>402/403, 802, 901</b>

<b>PLTF EXH. NO.</b>	<b>DESCRIPTION</b>	<b>OBJECTIONS</b>
<b>57</b>	<b>12/23/2002 Email from F. Pena to <a href="mailto:welcomm@samsung.com">welcomm@samsung.com</a> re Status 2002-12-23</b>	<b>402/403, 802</b>
<b>58</b>	<b>07/28/2008 Patent License Contract between Fractus and Telnet</b>	<b>402/403</b>
<b>59</b>	<b>09/30/2003 Collaboration Agreement between Fractus and Siemens</b>	<b>402/403</b>
<b>60</b>	<b>09/30/2003 Annex VII: to the Agreement between Fractus and Siemens</b>	<b>402/403</b>
<b>61</b>	<b>07/20/2007 Letter of Intent between Fractus and InterDigital</b>	<b>402/403, 802</b>
<b>62</b>	<b>07/27/2007 Summary of Proposed Acquisition Terms</b>	<b>402/403, 802</b>
<b>63</b>	<b>09/05/2007 Summary of Proposed Acquisition Terms between Fractus and Qualcomm</b>	<b>402/403, 802</b>
<b>64</b>	<b>07/24/2005 License and Service Agreement between Fractus and Ficosa</b>	<b>402/403</b>
<b>65</b>	<b>06/09/2010 Term Sheet between Fractus and Sharp</b>	
<b>66</b>	<b>05/13/2010 Term Sheet between Fractus and Sanyo</b>	
<b>67</b>	<b>05/00/2007 Article re Antennas for Mobile Devices</b>	<b>402/403, 802, 901, timeliness</b>
<b>68</b>	<b>00/00/2009 Frost &amp; Sullivan Article re North American Antenna Markets for Mobile Devices</b>	<b>402/403, 802, 901</b>
<b>69</b>	<b>10/01/2004 Article re An Inside Job (Wireless Week)</b>	<b>402/403, 802</b>
<b>70</b>	<b>03/19/2003 The Straits Times (Singapore) Article re My Mobile's good at all things - except being a phone</b>	<b>402/403, 802, timeliness</b>
<b>71</b>	<b>12/31/2004 - 12/31/2006 Charts re Fractus Mobile Net Revenues</b>	
<b>72</b>	<b>01/09/2011 Screenshot re NPD Group Mobile Phone Track</b>	

<b>PLTF EXH. NO.</b>	<b>DESCRIPTION</b>	<b>OBJECTIONS</b>
<b>73</b>	<b>02/06/2007 Memo from J. Mumbru and J. Ilario to J. Soler and T. Franco re Patent Marking of W.A. Products</b>	<b>402/403, 802, 901</b>
<b>74</b>	<b>12/05/2006 Memo from J. Mumbru and J. Ilario to J. Soler and T. Franco re patnet Marking of W.A. Products</b>	<b>402/403, 802, 901</b>
<b>75</b>	<b>07/12/2006 Memo from C. Puente and J. Mumbru to J. Ortigosa, X. Esteve, A. Sanz, J. Anguera and E. Kim re Patent Marking of Mobile Product</b>	<b>402/403, 802, 901</b>
<b>76</b>	<b>06/12/2006 Memo from C. Puente and J. Mumbru to J. Orgiosa, X. Esteve, A. Sanz, J. Anguera and E. Kim re Patent Marking of Mobile Product</b>	<b>402/403, 802, 901</b>
<b>77</b>	<b>08/27/2007 Memo from C. Puente, J. Mumbru, I. Sanz and M. Barba to J. Portabella, G. Montesinos, A. Sanz, E. Gracia X. Oliver and I. Tarruell re Patent Marking of Mobile Product</b>	<b>402/403, 802, 901</b>
<b>78</b>	<b>04/11/2008 Memo from C. Puente, J. Mumbru, I. Sanz and M. Marba to J. Portabella, G. Montesions, A. Sanz, E. Garcia, X. Oliver and I. Tarruell re Patent Marking of Mobile Product</b>	<b>402/403, 802, 901</b>
<b>79</b>	<b>07/19/2007 Memo from J. Mumbru, J. Ilario and M. Barba to J. Portabella, G. Montesinos, A. Sanz, E. Gracia, X. Oliver, I. Tarruell re Patent Marking of W.A. Product</b>	<b>402/403, 802, 901</b>
<b>80</b>	<b>02/06/2007 Memo from C. Puente, J. Mumbru, I. Sanz and M. Barba to J. Ortigosa, X. Esteve, A. Sanz, J. Anguera, E. Kim and A. Prieto re Product Marking of Mobile Product</b>	<b>402/403, 802, 901</b>
<b>81</b>	<b>06/11/2007 Presentation re Financial Projections</b>	<b>402/403, 802, 901</b>
<b>82</b>	<b>02/23/2007 Email from H. Mathiessen to C. Brogan, C. Puente, A. Garcia et al re Thank you</b>	<b>402/403, 802</b>

<b>PLTF EXH. NO.</b>	<b>DESCRIPTION</b>	<b>OBJECTIONS</b>
<b>83</b>	<b>10/01/1992 Letter from R. Marx, (K. Shoemaker) to B. Duvall re Confirming Antenna America's desire to work with LoJack on manufacturing antenna. (Shoemaker Ex. 3064)</b>	<b>402/403, 802</b>
<b>84</b>	<b>12/00/1995 Antennas America, Inc. Instruction Manual for Mobile Antennas (Shoemaker Ex. 3036)</b>	<b>402/403, 802</b>
<b>85</b>	<b>6/12/1996 LoJack Purchase Order re LJU Antenna Model No. TA1-US (Shoemaker Ex. 3070)</b>	<b>402/403, 802, 901</b>
<b>86</b>	<b>12/31/2009 Annual Report of Motorola, Inc.</b>	
<b>87</b>	<b>07/18/2010 Wall Street Journal article titled Apple Knew of iPhone Issue (Antenna Risks)</b>	<b>402/403, 802, timeliness</b>
<b>88</b>	<b>01/31/2007 Research Report entitled Mobile Handset Royalties Intellectual Property Rights Analysis for GSM, CDMA, WCDMA, HSDPA, LTE, WiMAX, and UMB Devices</b>	<b>402/403, 802, 901</b>
<b>89</b>	<b>01/00/2002 Business Plan Fractus 2002</b>	<b>402/403, 802</b>
<b>90</b>	<b>02/25/2004 Presentation re Antenna Basic Theory</b>	<b>402/403, 611, 802, 901, timeliness</b>
<b>91</b>	<b>10/01/2007 Patent License Agreement between Research in Motion and HTC</b>	<b>402/403</b>
<b>92</b>	<b>01/00/2007 Presentation re VX8600 PEC User Trial LG Electronics MobileComm - Market Research</b>	<b>402/403, 802, timeliness</b>
<b>93</b>	<b>07/00/2007 Presentation re LG Antenna Study Report</b>	<b>402/403, 802, timeliness</b>
<b>94</b>	<b>11/29/2004 License Agreement between Digital Wireless and LG</b>	<b>402/403, timeliness</b>
<b>95- 96</b>	<b>NOT USED</b>	



<b>PLTF EXH. NO.</b>	<b>DESCRIPTION</b>	<b>OBJECTIONS</b>
<b>97</b>	<b>05/00/1997 Fractal Antennas by Carles Puente Baliarda</b>	<b>402/403, 802</b>
<b>98</b>	<b>11/20/1997 Paper entitled: Correction of Truncation Effect (C.E.T.) 1.2 by Jordi Romeu, Monica Navarro, Carles Puente, Jordi Berenguer</b>	<b>402/403, 802</b>
<b>99</b>	<b>04/02/1998 Paper entitled: Adjustment of Input Impedance. P2/3SPK Dual Monopole 1.6 by Jordi Romeu, Monica Navarro, Carles Puente, Jordi Berenguer</b>	<b>402/403, 802</b>
<b>100</b>	<b>05/28/1998 Paper entitled: Monopolo Dual Aplicacion Microcelula Fractus II 1.7 by Jordi Romeu, Monica Navarro, Carles Puente, Jordi Berenguer</b>	<b>402/403, 802, Spanish</b>
<b>101</b>	<b>04/08/2005 Quality System Instructions</b>	<b>802</b>
<b>102</b>	<b>10/13/2005 Procedimientos Del Sistema De Calidad</b>	<b>402/403, 802, timeliness, Spanish</b>
<b>103</b>	<b>00/00/00 CD re Richardson Electronics Point of Sale</b>	<b>402/403, 802, 901</b>
<b>104</b>	<b>00/0/2010 IE3D™ IE3D User's Manual Release 15.0</b>	<b>402/403, 802, 901, timeliness</b>
<b>105</b>	<b>00/00/2010 Presentation re Mentor Graphics Applications of IE3D™ in Designing Planar and 3D Antennas Release 15.0</b>	<b>402/403, 802, 901, timeliness</b>
<b>106</b>	<b>00/00/0000 Manual HFSS Online Help</b>	<b>402/403, 802, 901, timeliness</b>
<b>107</b>	<b>03/16/2007 Email from E. Hinojo to R. Nogue re Samsung Chorus</b>	<b>402/403, 802, 901</b>
<b>108</b>	<b>00/00/0000 Samsung Purchase Order for Intenna-SGHT-709; ACQ-083; SGH-T709, 824</b>	<b>402/403, 901</b>
<b>109</b>	<b>00/00/1994 Term Project entitled Fractal Design of Multiband Antenna Arrays by Carles Puente Baliarda</b>	<b>402/403, 802</b>
<b>110</b>	<b>Physical Exhibits of Defendant phones re HTC</b>	<b>901</b>
<b>111</b>	<b>Defendant Antenna files re HTC</b>	

<b>PLTF EXH. NO.</b>	<b>DESCRIPTION</b>	<b>OBJECTIONS</b>
<b>112</b>	<b>Measurements of Defendant Antennas re HTC</b>	<b>402/403, 802, 901, timeliness</b>
<b>113</b>	<b>Geometrical Analysis of Defendant Antennas re HTC</b>	<b>402/403, 802, 901, timeliness</b>
<b>114</b>	<b>User Manuals of Defendant phones re HTC</b>	<b>402/403</b>
<b>115</b>	<b>11/01/2007 Email from H. Matthiessen re Aerial exclusivity</b>	<b>402/403, 802</b>
<b>116</b>	<b>05/12/2007 Email from H. Mattheissen to R. Bonet, C. Puente et al re Qualcomm Update</b>	<b>402/403, 802</b>

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a) on April 17, 2011. This document was served on all counsel of record by electronic mail on April 16, 2011.

By: /s/ David G. Wille  
David G. Wille